

## ClassScene Privacy Policy

ClassScene is committed to safeguarding your privacy on its website located at [www.ClassScene.com](http://www.ClassScene.com). This is the online privacy policy of Interactive Media Holdings, LLC – the company that runs ClassScene.com (ClassScene). This Privacy Policy does not apply to products or services provided, or information obtained, other than through the website. Please read the following policy to understand how your information will be treated. This policy may change from time to time, so please check back periodically.

If there is an important change in our collection, use, or disclosure practices, we will attempt to send you a notice via e-mail if you have provided us with an e-mail address. Please keep in mind that some of the services mentioned specifically in this policy may not be available on the site at this time. If you have questions concerning this policy, please contact **Privacy Officer** at [privacy@ClassScene.com](mailto:privacy@ClassScene.com). This Privacy Policy is effective as of September 1, 2007.

ClassScene gives special consideration to the privacy of users who are children under the age of 13. To review our privacy policies for young children, see the section below titled "Special Privacy Provisions for Children Under 13." We comply with the Children's Online Privacy Protection Act (COPPA). We strongly encourage parents to participate in their children's online activities and monitor their children's use of networking services, information posting, and engagement in other electronic communication. For more information about COPPA or children's privacy, please visit [www.ftc.gov/kidzprivacy](http://www.ftc.gov/kidzprivacy).

The purpose of our policy is to inform you about the types of information we gather about you online when you visit our site, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of and your ability to correct the information.

### What information does ClassScene collect from me?

ClassScene collects information in several ways. For example, some personal information is gathered when you register as a user through our account interface. During registration, if you are a student, we ask for your name, age, address, phone number, e-mail, school name, school affiliations, college plans, hobbies and interests. If you are a non-student we will ask for your name, age, address, phone number, and email. If you are under the age of 13, your parent or guardian must approve your registration and grant you permissions to use various components of the site. Once your registration is complete, you are no longer anonymous to ClassScene and are able to take full advantage of our services. In addition to registration, we may ask you for information at other times, such as when you report a problem with our site or services, or contact the company via the corporate e-mail address. If you contact ClassScene, we may keep a record of that correspondence.

If you contact us by e-mail, we use your e-mail address (which is personally identifiable information) only to respond to your specific request or question. If we ask for your parent's e-mail address, we keep that information and use it only for the purpose of providing notices to parents, administering account permissions and parental approvals, requesting parental consent as required under COPPA, and keeping a record of such consent and approvals.

We may collect your contact information where necessary for your safety. If you want full access to our site, we will collect your parent's e-mail address to contact your parent for their consent to your use of the site. We may also collect your name and e-mail address for the limited purposes of protecting the security and integrity of the site, taking precautions against liability, responding to the judicial process, or for law enforcement on a matter related to public safety.

If you believe that any inaccurate or inappropriate information has been obtained or disseminated through your use of this website, you should contact a representative of **ClassScene** at **privacy@ClassScene.com**.

## **How does ClassScene use cookies and other technology?**

We may collect information through technology to make our site more interesting and useful to you. For instance, we collect IP addresses and use technology to track traffic patterns on the site. Once you have logged into the site, we may track your activities by using logs of database transactions and server interactions. This data is used to improve your online experience. We also use this information to understand which areas of our website are most appealing or least appealing. Our site also uses cookies, which are pieces of information that a website sends to your computer while you are viewing the website. Cookies provide information to the site so that the site will remember who you are. These technical methods may involve the transmission of information either directly to us or to another party we authorize to collect information on our behalf.

## **How does ClassScene use the information?**

ClassScene's primary goal in collecting information is to improve the site and provide the user with the best possible experience on the site. For example, by using the information collected, we are able to provide you with an easy to use and readily available forum to access your school's online environment. We will also use your personal information to notify you of other products or services available from ClassScene and its affiliates.

Except as provided herein, only ClassScene will have access to individuals' account information. We also may do research on our users' demographics and behavior based on the information provided to us upon registration, gathered from transaction activity, from our server log files or from surveys. This research may be compiled, analyzed or sold on an aggregated basis, which does not include information identifying individual

users. ClassScene also may share this data with business partners or other third parties.

ClassScene may also share certain information with third parties such as affiliated educational institutions, but such sharing is on an opt-in basis only. (See Choice/Opt-In below).

## **Who is collecting information?**

When you are on a ClassScene site and are asked for personal information, you are sharing that information with ClassScene and its parent company. If personal data is to be collected and/or maintained by any company other than ClassScene or its parent company, we will attempt to notify you on the website or in an updated version of this Privacy Policy. If you do not want your data to be shared, you can choose not to allow the transfer by not using that particular service.

Please be aware that other websites to which we link may collect personally identifiable information about you when you visit those sites. The information practices of other websites linked to our websites are not covered by this Privacy Policy.

## **With whom does ClassScene share my information?**

We will not disclose any of your personally identifiable information except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it or under the circumstances described below. The following describes some of the ways that your information may be disclosed.

Content: Information, videos, photos, text, and other content that you upload to the site will be associated with your registered school's account, subject to the content control settings selected by the registered school and any related parent.

Blinded Data: We may disclose "blinded" aggregated data and user statistics to prospective partners and other third parties, and for other lawful purposes. Blinded data is data that does not identify an individual person.

Students: All information shared by you online will be made available to your parent or guardian and you expressly consent to ClassScene's disclosure of such information to your parent or guardian.

Schools: All information shared by you online may be made available to your school administrators and you expressly consent to ClassScene's disclosure of such information to your school administrators.

Other: We also may disclose your information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating ClassScene's Terms of Use Agreement, or may otherwise be causing injury to or interference with (either intentionally or unintentionally) ClassScene's rights or property, other ClassScene website users or

customers, or anyone else that may be harmed by such activities. We may disclose or access account information when we believe in good faith that the law requires it and for administrative and other purposes that we deem necessary to maintain, service and improve our products and services.

We occasionally hire other companies to provide limited services on our behalf, including packaging, delivering, answering customer questions about products or services, sending postal mail, providing investor information, and processing data. We will only provide those companies the information they need to deliver the service, and they are contractually prohibited from using that information for any other purpose.

As we continue to develop our business, we may buy or sell businesses or assets. In such transactions, confidential customer information generally is one of the transferred business assets. In the event of a transaction involving the sale of some or all of ClassScene's businesses, customer and site visitor information may be one of the transferred assets. In such case, the transferred information may become subject to a different privacy policy.

Based on your permission via opt-in choice, we may share your information with business affiliates that have strategic and business partnerships with IMH. These alliances are carefully screened to further the mission of ClassScene.com to provide an enriching environment that facilitates school spirit and academic success.

## **How can I control my personal information?**

ClassScene offers its users choices for the collection, use and sharing of personal information. You may login at [www.classscene.com](http://www.classscene.com) if you wish to view, edit or delete your personal information from our database, and we will use commercially reasonable efforts to accommodate your request.

## **How does ClassScene protect financial-related information?**

Keeping your personal financial information private is vitally important to us. As a matter of policy and business practice, ClassScene does not sell personal information provided by its customers. At ClassScene, we conform to the Payment Card Industry (PCI) Data Security Standard for the protection of financial credit card information. This standard provides security requirements for credit card merchants to safely secure, transport and store your sensitive personal and financial data. We may report a security breach to you as required by law. Any user statistics that we may provide to prospective partners regarding financial matters are provided in the aggregate only and do not include any personally identifiable information about any individual user. We will transfer your credit card number, bank account number or other personal information to the appropriate credit card company or bank in order to process any online payments.

## **What security precautions are in place to protect the loss, misuse, or alteration of my information?**

Your ClassScene Account Information and ClassScene Profile are password-protected so you have access to this personal information. We use secure socket layer (“ssl”) encryption technology for all transmission of credit card numbers, bank account numbers, passwords, and registration information. Remember to sign out of your ClassScene account and close your browser window when you have finished your work. This is to ensure that others cannot access your account by using your computer when you are away from it.

Because of the global nature of the Internet, when you give us information, that information may be sent electronically to servers outside of the country where you originally entered the information. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Except as discussed above or otherwise designated, this site does not use security encryption measures over the Internet. Therefore, information that you disclose by use of this site, by posting a message or using e-mail, potentially could be collected and used by others since e-mail and message postings are not encrypted. This may result in unsolicited messages from third parties or use of such information by third parties for their own purposes, legal or illegal. As a result, while we strive to protect your personal information, ClassScene cannot ensure or warrant the security of any information you transmit to us or from our services, and you do so at your own risk. Once we receive your transmission, we use commercially reasonable efforts to ensure its security on our systems.

## **Choice/Opt-In**

Except for administrative messages needed to run the site and administer your account, our website provides users the opportunity to opt-in to receiving communications from us. Where indicated, just click on the appropriate radio button when completing a survey, form, or registration process to opt-in to the designated communication. For example, you may be able to opt-in to communications with ClassScene strategic partners, participation in research products and communications with other third parties. By default, you are excluded from communications with affiliated educational programs unless you opt-in. We operate in this manner to protect your choice as a consumer of our services. Please allow a reasonable period of time for your changes to take effect.

To ensure that you will not receive recurring marketing information from us unless you choose to, we will provide simple instructions on every marketing e-mail from ClassScene for you to let us know that you have chosen to stop receiving such e-mails from us.

## **What else should I know about my privacy?**

Please keep in mind that whenever you voluntarily disclose information online, that information is accessible to other customers and users. Ultimately, you are solely

responsible for maintaining the secrecy of your passwords and/or any account information. Please be careful and responsible whenever you are online.

When you or we end your customer relationship with us, we will treat the information we have about you as if you were still our customer.

## **Special Privacy Provisions for Children Under 13**

We carefully follow the Children's Online Privacy Protection Act (COPPA). COPPA requires us to inform parents and legal guardians about how we collect, use, and disclose personal information that we receive from children under 13 years of age. We must obtain the consent of parents and guardians in order for children under 13 years of age to use certain features website features. The following is an explanation of our practices with respect to children under the age of 13 (Young Children) and our verifiable parental consent process for parents or guardians of Young Children (Parents).

### **What types of personal information do we collect about Young Children?**

Young Children can use publicly available portions of ClassScene.com without disclosing any personal information. However, to become a ClassScene member, we do need to collect personal information.

Unless your Parent limits your user account, we collect the same information from Young Children as we do other users of the site (see **What information does ClassScene collect from me?**). This includes information such as name, age, address, phone number, e-mail, school name, school affiliations, education plans, hobbies and interests. We ask you this information to facilitate the online school community. We do not ask such information as a condition to your participation in any special activity.

We may collect personal information from Parents in order to allow Young Children to participate in certain features located on our websites. These features may include sending e-mail, posting on message boards, uploading content, and other similar activities. In the course of a Young Child's participation in these features, a Young Child may also provide us additional information about himself or herself, such as the contents of his or her message board postings. If a Parent allows us to collect personal information about their Young Child, we may link certain information collected through technology (see **"How does ClassScene use cookies and other technology?"**) to that personal information.

### **How do we use and share the personally identifiable information that we have collected about Young Children?**

If a Young Child registers for membership, we use the Parent's e-mail address to notify the Parent of the Young Child's registration request and to seek verifiable parental consent. In addition, personal information regarding a Young Child may be collected and used to enable a Young Child's participation in certain interactive features such as sending e-mail, posting on message boards, uploading content, and other similar activities. These activities may involve disclosure of a Young Child's personal information to third parties. In addition, we may share a Young Child's personal information with third parties to the extent reasonably necessary to: protect the security and integrity of our sites; to take precautions against liability; to respond to judicial

process; or to the extent permitted under provisions of law, to provide information to law enforcement agencies or for an investigation related to public safety. Information of Young Children may also be used and disclosed in accordance with the sections above titled **How does ClassScene use the information?** and **With whom does ClassScene share my information?**

### **How does ClassScene notify Parents and obtain consent from Parents for the collection of information from their Young Children?**

All student users of ClassScene who are minors must be registered by their Parent. The Parent enters the Parent Registration Page on ClassScene and provides contact information for the Parent and any child the Parent wishes to register. The registration process includes age information about each child. The Parent is then asked for credit card information and a small transaction is run through Pay Pal to confirm the Parent's identity. The charge is then promptly reversed. Once validated, the Parent may register his or her children and may designate participation levels for each child. All participation levels are "opt-in" by the Parent.

### **How can parents access, change or delete personally identifiable information about their Young Children?**

At any time Parents can refuse to permit us to collect further personal information from their Young Child and can request that any personal information we have collected be deleted from our records. We use two methods to allow Parents to access, change, or delete the personally identifiable information that we have collected from their Young Children. A parent can access, change, or delete his or her Young Child's personal information by logging on to the Parent's account. Allow a reasonable period of time for any changes to take effect. Such change or deletion will not result in a corresponding change or deletion in any portion of the site made available to others.

A parent can also contact our Customer Service Department to access, change, or delete the personal information that we have collected from his or her Young Child by sending an e-mail to [support@ClassScene.com](mailto:support@ClassScene.com). Please include the Young Child's full name and school and the parent's e-mail address in the e-mail so that we can better assist you with your inquiry or request.

### **How does ClassScene notify parents if our Privacy Policy changes?**

We may amend our Privacy Policy at any time, including portions applicable to Young Children. We will provide Parents notice by e-mail of any material changes in the way we intend to collect, use, and/or share personal information of Young Children. Parents should continually update their personal information to provide us current e-mail addresses. We will apply material changes in our Young Children' Privacy Policy only in conformance with applicable law, including any applicable provisions of COPPA that require parental consent.

## **Who do users contact with questions or concerns about our Privacy Policy?**

If you need further assistance, please send an e-mail with your questions or comments to [support@ClassScene.com](mailto:support@ClassScene.com) or write us at:

ClassScene

Interactive Media Holdings, LLC

903 E. 104<sup>th</sup> St, Suite 700

Kansas City, Missouri 64131

Attn: [Privacy@ClassScene](mailto:Privacy@ClassScene)

You may also telephone us at 877-723-6344. If you are not 18 years of age or older, you must have your parent or guardian's permission to call this number.